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**From:** Woodward, Katherine  
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**Subject:** Modified Self-Implementing PCB Cleanup Plan

Mike:

NSTAR submitted a Notification to EPA dated June 2012 to address PCB contamination found in soil at the NSTAR Station 292. EPA approved the plan addressing the *PCB remediation waste* under 40 CFR § 761.61(a) and (c) on August 16, 2012. Subsequently NSTAR determined that additional upgrades are required at the existing Station 292.

On November 22, 2016, NSTAR submitted a proposed modification to its PCB plan in accordance with the provisions of Condition 16, Attachment 1 of the Approval and the procedural requirements of 40 CFR § 761.61(a)(3)(ii). This modification proposes to dispose of PCB-contaminated soils with PCB concentrations < 2 ppm in accordance with MassDEP Policy Comm-97-001 and *PCB remediation waste* with PCB concentrations between 2 ppm and 50 ppm in accordance with § 761.61(a)(5)(i)(B)(2)(ii). Based on the site characterization data collected in April and August-September 2016 for the upgrades to be completed in Fall and Winter 2016, soil PCB concentrations, except for sample Disp-02 comprised of Trench 61, 62, and 63 with a PCB concentration of 9.84 ppm, was determined to have PCBs < 1 ppm, which does not require an approval from EPA for disposal.

EPA has determined that there has been sufficient sampling to delineate the area of *PCB remediation waste* with PCBs > 2 ppm, but < 50 ppm. Therefore, in the event that the soil with PCB concentrations cannot be retained in the area of the Site covered by the AUL, it is reasonable to dispose of this soil in accordance with § 761.61(a)(5)(i)(B)(2)(ii) for this portion of the project. *PCB remediation waste* with PCB concentrations ≥ 50 ppm will be disposed of in accordance with § 761.61(a)(5)(i)(B)(2)(iii).

The proposed modification to NSTAR's PCB cleanup and disposal plan is reasonable and consistent with the requirements under 40 § CFR 761.61(a) and the modification provision of 40 CFR § 761.61(a)(3)(ii).

Please ensure that this is captured within the Completion Report to be submitted in accordance with EPA's Approval.

Should you have any questions, please feel free to contact us.

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